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dba Bella's Hacienda Ranch*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA (RENO)

JANE DOE;

Plaintiff,

v.

**JOSEPH LOMBARDO, Governor of
Nevada, in his official capacity; AARON
FORD, Attorney General of Nevada, in his
official capacity; NYE COUNTY; ELKO
COUNTY; STOREY COUNTY; WESTERN
BEST, INC. D/B/A CHICKEN RANCH;
WESTERN BEST, LLC; DESERT ROSE
CLUB, LLC; HACIENDA ROOMING
HOUSE, INC. D/B/A BELLA'S HACIENDA
RANCH; MUSTANG RANCH
PRODUCTIONS, LLC d/b/a MUSTANG
RANCH LOUNGE, LLC; LEONARD
"LANCE" GILMAN, in his
official capacity; and LEONARD "LANCE"
GILMAN, in his individual capacity,**

Defendants.

Case No. 3:24-cv-00065-MMD-CSD

**DEFENDANT HACIENDA ROOMING
HOUSE, INC. D/B/A BELLA'S
HACIENDA RANCH'S RESPONSE TO
PLAINTIFF'S RESPONSE [#115] TO
ORDER TO SHOW CAUSE [#112]**

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MEMORANDUM OF POINTS AND AUTHORITIES

Defendant Hacienda Rooming House, Inc. d/b/a Bella's Hacienda Ranch ("Bellas") hereby responds to Plaintiff's Response [#115] to this Court's Order to Show Cause [#112].

In response to Jane Doe's response [#115, pp. 9 and 10] to this Court's order to show cause, dismissal is proper as Doe did not allege any injury in fact sufficient to support standing to assert these claims against Bella's. Doe did not specify the amount or date of any "fines" allegedly imposed by Bellas, such as for "opening a window" or that she actually paid any such fine. [#115, p. 10 line 3]. "Threatening to report Jane Doe for prostitution without a license" does not violate the constitution or any federal law as such conduct by Jane Doe would be illegal, thus, making a report thereon is proper - not coercive. [#115, p. 10 lines 13-16]. While Jane Doe states that "Bella's took 50% of the fees Jane Doe received from sex buyers," this does not qualify as a coercive fee and fine as Jane Doe agreed to this fee share. [#115, p. 10 lines 1-2]. Nowhere does she allege that she did not agree to this arrangement. While Jane Doe alleges that "her requests to leave where sometimes denied" she does not specify the reason, if any, that was given as to why her requests were denied, the date and times such requests were denied, who denied them etc. [#115, p. 10 lines 7-8]. Lastly, Jane Doe does not allege that she owes any debt to Bellas.

Bella's hereby incorporates by reference, as if fully set forth herein, the arguments asserted by Defendants Mustang Ranch Productions, LLC and L. Lance Gilman [#123] and Desert Rose Club, LLC [#124] (collectively, "Brothel Defendants") in their responses, particularly : (1) Doe lacks standing to assert claims against Bellas; (2) Doe has not alleged any injury in fact sufficient to support standing; (3) Doe does not allege that she owes a debt to Bellas sufficient to show concrete injury in fact; (4) Doe does not have a private right of action under the Thirteen

1 Amendment; (5) Doe's alleged injuries are not fairly traceable to Bellas; and (6) Jane Doe's
2 allegations do not meet the concrete, particularized, and actual harm required by *Driehaus* or the
3 plausibility standard of *Iqbal* and *Twombly*.

4 Lastly, many courtesans have worked at Bellas over the years. Bellas cannot fairly respond
5 to the allegations asserted in this lawsuit without knowing the identity of Jane Doe and when she
6 worked at Bellas. If this lawsuit is allowed to proceed, Bellas requests that the identity of Jane
7 Doe be revealed so that Bellas can fairly respond to her allegations.
8

9 DATED: September 16, 2024

STEPHENSON LAW, PLLC

10 *John Neil Stephenson*

11 By: John Neil Stephenson

12 Its: Managing Member

13 *Counsel for Defendant Hacienda Rooming
House, Inc. dba Bella's Hacienda Ranch*

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing, DEFENDANT HACIENDA ROOMING HOUSE, INC. D/B/A BELLA'S HACIENDA RANCH'S RESPONSE TO BROTHEL DEFENDANTS' RESPONSES [##123, 124] TO PLAINTIFF'S RESPONSE [#115] TO ORDER TO SHOW CAUSE [#112] by using the CM/ECF system on the date indicated below. To the best of my knowledge and belief, I certify that participants in the case are registered electronic filing system users and will be served via this Court's CM/ECF system.

DATED: September 16, 2024

STEPHENSON LAW, PLLC



By: John Neil Stephenson

Its: Managing Member

*Counsel for Defendant Hacienda Rooming
House, Inc. dba Bella's Hacienda Ranch*